

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

OFFICE OF THE HEALTH ADVOCATE, by
itself and in representation of dialysis patients
insured by MCS Advantage, Inc. (MCS),

Plaintiff,

v.

MCS ADVANTAGE, INC; MCS HEALTH
MANAGEMENT OPTIONS, INC.;
FRESENIUS HEALTH PARTNERS
PUERTO RICO, LLC d/b/a FRESENIUS
MEDICAL CARE; ATLANTIS HEALTH
CARE GROUP,

Defendants.

**CIVIL CASE NO. 12-1814 (FAB) (LEAD
CASE; CONSOLIDATED WITH CIVIL
NO. 12-1815)**

RE: NOTICE OF REMOVAL

IN RE: FRESENIUS MEDICAL CARE;
ATLANTIS HEALTH CARE GROUP; MCS
HEALTH MANAGEMENT OPTIONS, INC.
(MCS HMO); SECRETARÍA AUXILIAR
PARA REGLAMENTACIÓN Y
ACREDITACIÓN DE FACILIDADES DE
SALUD; ÁNGEL MARTÍNEZ – PORTAVOZ
DE PACIENTES EN PROCESO DE
TRANSICIÓN.

**CIVIL CASE NO. 12-1815 (FAB)
(CONSOLIDATED WITH CIVIL NO. 12-
1814)**

RE: NOTICE OF REMOVAL

**NOTICE REGARDING CERTIFICATE OF SERVICE
OF DOCKET ENTRY NO. 43**

TO THE HONORABLE COURT:

COME NOW MCS Advantage, Inc. (“MCS Advantage”) and MCS Health Management Options, Inc. (“MCS HMO”) (collectively, “MCS”), through the undersigned attorneys, and respectfully request that this Honorable Court take notice of the following:

1. On Friday, January 11, 2013, MCS filed its opposition to the motion to alter or amend judgment filed by Atlantis Health Care Group.
2. I hereby certify that the opposition, which was entered as Docket Entry No. 43, was electronically filed with the Clerk of Court using the CM/ECF system, which then automatically provided notice to all counsel of record.

WHEREFORE, MCS very respectfully requests that this Honorable Court take notice of the above.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, on January 15, 2013.

I HEREBY CERTIFY that on this same date, I electronically filed this document with the Clerk of Court using the CM/ECF system, which will automatically notify all counsel of record.

O'NEILL & BORGES LLC

Attorneys for *MCS ADVANTAGE, INC. and*
MCS HEALTH MANAGEMENT OPTIONS, INC.

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